

APL

UNITED STATES DISTRICT COURT **FILED**
SOUTHERN DISTRICT OF CALIFORNIA

2012 AUG -3 PM 2:20

UNITED STATES OF AMERICA

Magistrate Case No. 12-12899
SOUTHERN DISTRICT OF CALIFORNIA

Plaintiff,

v.

COMPLAINT FOR VIOLATION

Jamie Heriberto Santana,
Claudia Stephanie Alvarez,
Keke Jamar Caldwell,
Laresha Wilson,
Defendants.

Title 18, U.S.C. §1591(a) and (b)-
Sex Trafficking of Minors

Unsealed on 8/16/12

SEALED

The undersigned Complainant, being duly sworn, states:

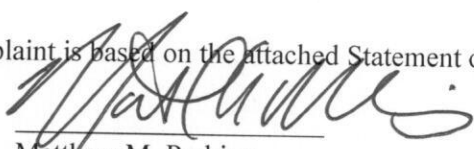
Count 1

On or about and between December 25, 2011 through February 16, 2012, within the Southern District of California, defendant Jamie Heriberto Santana, Claudia Stephanie Alvarez, , knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, to wit: Juvenile Female 1 (JV1) and Juvenile Female 2 (JV2), knowing and in reckless disregard of the fact that JV1-2: (1) would be caused to engage in a commercial sex act; and (2) having had a reasonable opportunity to observe JV1-2 and knowing and in reckless disregard of the fact that JV1-2 had not attained the age of 18 years; in violation of Title 18, United States Code, Sections 1591(a) and (b).

Count 2

On or about and between June 26, 2012 and July 2, 2012, within the Southern District of California, defendant Jamie Heriberto Santana and Laresha Wilson, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, to wit, Juvenile Female 2 (JV2): (1) knowing and in reckless disregard of the fact that JV2 would be caused to engage in a commercial sex act; and (2) having had a reasonable opportunity to observe JV2 and knowing and in reckless disregard of the fact that JV2 had not attained the age of 18 years; in violation of Title 18, United States Code, Section 1591(a) and (b).

And the complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Matthew M. Perkins
Special Agent, FBI

Sworn to me and subscribed in my presence this 3rd day of August, 2012.



UNITED STATES MAGISTRATE JUDGE

ANX 4 ΔS

8/16

STATEMENT OF FACTS

I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) assigned to the San Diego, California, office. I am assigned to the North County Resident Agency, where among my duties I currently am assigned to investigate Violent Crimes, including child prostitution matters.

On December 25, 2011, Jaime Santana and (JV2) first met by chance at the Solana Beach Transit Center. Santana asked her what she did to make money. (JV2) replied that since she was only 17 years old, she earned money by babysitting. He told her that if she wanted to make real money she should work for him escorting men. She asked if he was a pimp to which he said that is a derogatory term and preferred something less offensive. He encouraged her to find a friend willing to prostitute and to remain in contact.

On January 13, 2012, (JV2) along with a friend, (JV1) met Santana at the Carlsbad Transit Center and traveled with him to 3454 Del Sol Blvd. Apt F, San Diego, California 92154, an apartment where Claudia Alvarez and Santana lived together. This was the first time (JV1) and (JV2) met Alvarez and Keke Caldwell, Alvarez' ex-boyfriend. Through conversations between Santana and Caldwell it was understood that (JV2) would work for Santana and (JV1) would work for Caldwell. According to (JV2), Santana did not want to prostitute (JV1) because she looked too young for him.

On January 14, 2012, Alvarez, Santana, Caldwell, (JV1) and (JV2) traveled by vehicle, driven by Alvarez to an auto repair business. Once, there Alvarez negotiated a sex act between (JV1), (JV2) and Rudolfo Basulto. Basulto fondled the girl's nude breasts and massaged their bodies. Once complete, money was exchanged and shared between Alvarez, Santana, and Caldwell. The group then traveled to El Cajon Boulevard where Caldwell, Santana, and Alvarez instructed the girls on how to walk the street soliciting sex for money. They provided telephone numbers to (JV1) and (JV2) to call once they had received money from sex transactions.

On February 16, 2012, (JV2) was detained by San Diego Police Department on suspicion of theft at a Rite Aid. The loss prevention officer and Store Manager observed (JV2) give Claudia Alvarez a large bundle of money. (JV2) advised the loss prevention officer that she was prostituting. (JV2) was arrested on an outstanding warrant.

During an interview subsequent to her arrest, (JV2) advised that Santana was her pimp. Santana along with Alvarez worked together to photograph and post ads on www.Backpage.com (backpage) under the alias "Jade" soliciting individuals for sex. A search was conducted on backpage against the screen name "Jade". Three posts were located, two containing photos of (JV2) and one without photos. (JV2) confirmed that all three postings were hers. The ads were posted between January 23, 2012 and February 11, 2012.

Backpage was served with subpoenas for the three postings identified by (JV2). The results indicated that the posters telephone number was 619-xxx-3115 and the email address belonging to Alvarez. This account on at least one occasion listed the owner of the account as Claudia Alvarez. Telephone number, 619-xxx-4539, was listed in the administrative section of the return. On November 27, 2011, Caldwell was field interviewed by a San Diego Police Officer. He advised the officer his telephone number was 619-xxx-4539.

During her stay with Santana and Alvarez, (JV2) was directed on numerous occasions to provide sex for money. Santana and Alvarez arranged for both, out-calls at businesses, hotels, and other venues,

and at least one in-call that occurred at Santana and Alvarez's apartment. Both Alvarez and Santana received money from the in-call and out-call transactions.

A subpoena was served to Google Inc. for Alvarez's email address. Subpoena results listed "Stephanie baby" as the account holder's name. Additional account was listed under "Claudia Williams". Claudia Alvarez's middle name is Stephanie.

A subpoena was served on Cricket wireless for cellular telephone number 619-xxx-3115. Subpoena results listed Maria Gomez, 720 Kedzie Avenue, San Diego, California 92154 as the subscriber address. The account was activated on January 18, 2012. A record search for Jamie Santana revealed 720 Kedzie Avenue as a place of residence. Cricket wireless billing information listed Courtney Porter, 3665 Grove Street Unit 175, Lemon Grove, California 91945, as providing payment for the service on two occasions. (JV2) advised that Courtney Porter was Santana's ex-girlfriend and that Maria Gomez is the name of a girl she met while in Juvenile Hall. Records checks confirmed Courtney Porter and the address given.

Alvarez was subsequently contacted and interviewed. Alvarez advised that she was aware (JV2) was prostituting while living at her residence. She also claimed to be given \$200.00 by (JV2) which was for Rent. She advised that her email address was the one listed above on the backpage ads. She stated Santana was JV2's pimp.

On June 26, 2012, (JV2) was reported by her mother as missing from home. On July 2, 2012, (JV2) was contacted by law enforcement pursuant to an outstanding warrant. In the subsequent interview, she advised that she had contacted Santana via telephone. During that conversation, Santana advised her that if she did not return to San Ysidro and work for him he was going to "shoot up" her residence. (JV2) believed that Santana was going to kill her. (JV2) has seen Santana with firearms in the past and he has told her he keeps a firearm at his mother's residence. (JV2) was scared that Santana was going to harm someone in her family and believed her only option was to do as Santana directed.

Once in San Ysidro, she went to a Motel 6 where Santana was staying. She stayed in Motel 6 with Santana, his girlfriend Laresha Wilson, and other members of her family. The motel room was in Wilson's name. According to the motel staff it was Santana who paid the bill in cash. While at the motel, Santana and Wilson arranged multiple in-call "dates" for (JV2) which were advertised on backpage under the alias "Amber". (JV2) advised that it was Santana that would control the money which was used to purchase narcotics, clothing, food and pay for the motel.

A search was conducted on backpage against the screen name "Amber". Two posts were located that contained photos of (JV2). (JV2) confirmed that the two postings were hers. The contact number on one of the posts was 619-xxx-3692.

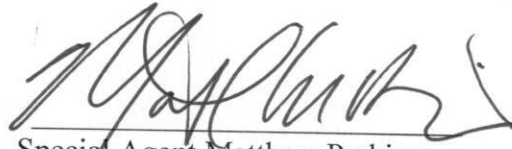
On July 2, 2012, Santana was arrested on state charges at Knights Inn, 230 Via De San Ysidro, San Ysidro, California. During the interview of Santana, he advised that another person made him recruit girls for prostitution. Santana stated it was his job to recruit girls and "sell them a dream". His other duties included keeping watch over the girls in his charge. Santana advised that he did not collect money from (JV2) however in exchange for keeping watch he was compensated by the other person through, spending money, drugs, food, and shelter. Santana first learned that (JV2) was a minor after her first arrest. Santana advised that during the months that (JV2) was prostituting, the cellular telephone number he used was 619-xxx-3115.

During a consent search of the motel room, paperwork belonging to (JV2) was located. Also located in the room were several notebooks. In these notebooks the scripts used in the backpage posts for

(JV2) and Wilson were written out. Also in the notebooks was account information for various accounts including backpage and pay and owe sheets for "johns" Wilson admitted to being a prostitute but said she was not working for Santana. Wilson advised that while at Motel 6, she posted an ad on backpage of herself. The telephone number on the post was 619-xxx-3692. That is the same contact telephone number on one of the (JV2) "Amber" posts.

REQUEST FOR SEALING

It is further respectfully requested that this Court issue an Order sealing, until further order of this Court, all papers submitted in support of this complaint, including the probable cause statement and arrest warrant. Sealing is necessary because premature disclosure of the contents of this probable cause statement and related documents may cause the defendant to flee and may cause the destruction of evidence and may have a negative impact on this continuing investigation.


Special Agent Matthew Perkins
FBI